

**THE KRUDYS LAW FIRM**

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**Mark J. Krudys**  
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January 10, 2025

**Via E-Mail**

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**Re: Logan-Patterson v. Wyatt, Case No.: 3:24-cv-526**

Dear Stanley:

I address below the issues raised in your January 3, 2025 letter. I apologize for the delay, I had a complex hearing this week and, as you know, most offices in Richmond have been closed this week.

**Request for Production Number 18**

Plaintiff agrees to produce any communications contained on his phone from dates other than December 11, 2023 that are relevant to any asserted claims or defenses in this matter.

**Request for Production Number 19**

Plaintiff has no other content relevant to any asserted claims or defenses in this matter.

**Request for Production Number 33**

No “photographs, videos, [or] location data” from dates other than December 11, 2023 are relevant to any asserted claims or defenses in this matter. The defense that Plaintiff allegedly “participat[ed] in an immoral or unlawful act” is limited to the crimes for which he was wrongfully detained, which took place on December 11, 2023. The location of his phone on other dates is not relevant to that defense, nor is it relevant to any of Plaintiff’s claims.

**Interrogatory 1**

While much of what you claim is deficient in Interrogatory 1 will be found in the review of Plaintiff’s phone regarding December 11, 2023, in an effort to avoid taking a discovery dispute to the Court, Plaintiff will attempt to provide what further detail he can remember. However, it is not incumbent upon Plaintiff to provide information he does not possess.

**Interrogatories 5 and 6**

Plaintiff already had much of the information provided in the Initial Disclosures prior to filing suit and included it in the Complaint. However, again, in an attempt to avoid discovery disputes going to the Court, Plaintiff will provide further information, though much of it will be from the Complaint.

In conclusion, Plaintiff will provide some supplemental answers to Interrogatories 1, 5, and 6 next week. And will provide a supplemental response to RFP 18 if any relevant communications are found.

Please feel free to contact me if you have any additional questions or concerns.

Best regards,

A handwritten signature in blue ink, appearing to read 'Mark J. Krudys', with a stylized, flowing script.

Mark J. Krudys